

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

## 5 POST OFFICE SQUARE, SUITE 100 BOSTON, MASSACHUSETTS 02109-3912

OCT 1 8 2016

Jason Kudelka, President Poly-Metal Finishing, Inc. 1 Allen Street Springfield, MA 01108

Re: Approval of Waiver of Performance Testing under the Chromium NESHAP

Dear Mr. Kudelka:

Poly-Metal Finishing, Inc. located at 1 Allen Street, Springfield, Massachusetts, is subject to the Clean Air Act National Emission Standards for Hazardous Air Pollutants for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, found at 40 CFR Part 63, Subpart N ("Subpart N"). On October 9, 2014, Poly-Metal Finishing submitted a request under 40 CFR §63.7(h)(2) to the United States Environmental Protection Agency ("EPA") to waive the performance testing requirement in Subpart N. According to 40 CFR §63.7(e)(2)(iv), EPA may waive a performance test because the owner or operator has demonstrated by other means that the source is in compliance with the relevant standard.

EPA reviewed the supporting documentation provided by Poly-Metal Finishing, and issued a Denial of Waiver of Performance Testing on July 17, 2015.

On July 23, 2015, November 23, 2015, and October 3, 2016, Poly-Metal Finishing provided additional documentation to EPA. EPA inspectors visited the facility on October 28, 2015 and September 21, 2016, and have reviewed the semi-annual compliance reports submitted by Poly-Metal Finishing as required by Subpart N.

The regulations set forth at 40 CFR 63.7(h)(4)(iii) provide that the Administrator may approve a request for a waiver of a performance test when she makes a determination of compliance following the submission of a required compliance status report or excess emissions and continuous monitoring systems performance report. Based on EPA's review of the semi-annual compliance reports, as well as documentation pertaining to operating conditions for the plating tanks and associated scrubber, including maintenance records, EPA approves Poly-Metal Finishing's request for a performance test waiver.

Approval of this waiver shall not abrogate the Administrator's authority under the Clean Air Act, or in any way prohibit the Administrator from later cancelling the waiver after notice to the owner or operator.

If you have any questions regarding this approval please contact Steve Rapp, Chief of the Air Technical Unit, at 617-918-1551.

Sincerely,

H. Curtis Spalding

Regional Administrator

Cc:

Saadi Motamedi, MassDEP WERO